

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS  
WESTERN DIVISION

ELIZABETH STEFFENBERG,

Plaintiff,

v.

T. GENE GILMAN, STEVEN GILMAN, THE GILMAN  
INSURANCE AGENCY, INC., DAVID M. SCOLL,  
ARBOR SECURITIES, LTD., ALLIANCE  
INVESTMENT MANAGEMENT, COMMONWEALTH  
FINANCIAL HOLDINGS INC., FINANCIAL LINKS,  
INC., T. GILMAN & CO., LTD., FIRST ALLIED  
SECURITIES, INC., PENSON FINANCIAL SERVICES,  
INC., AVIVA USA CORPORATION, TRADETEK,  
LTD. and TRADETEK, LLC,

Defendants.

CIVIL ACTION NO. 04-40113-  
FDS

**SUPPLEMENTATION TO DAVID M. SCOLL'S RESPONSE TO  
PLAINTIFF'S FIRST REQUEST FOR PRODUCTION OF  
DOCUMENTS**

The Defendant, David M. Scoll (hereinafter "Scoll"), hereby submits, pursuant to Rule 26(e) of the Federal Rules of Civil Procedure as well as Local Rule 26.6(A) and Local Rule 34.1(E) of the Local Rules of the United States District Court for the District of Massachusetts (hereinafter "Local Rules"), his supplementation to his response to the Plaintiff's First Request for Production of Documents. See Deft. David M. Scoll's Resp. to Pl.'s First Req. for the Prod. of Docs. dated June 24, 2004 (hereinafter "Scoll's Response")(attached as Exhibit B to Pl.'s Mem. in Supp. of Pl.'s Mot. to Compel Responses to Pl.'s First Req. for Prod. of Docs. to Deft. David M. Scoll dated Aug. 27, 2004).

The amendment to Scoll's Response consists of the attached Privilege Logs for Requests Numbered 1 and 18-42 of the Plaintiff's First Request for Production of Documents. See Pl.'s First Req. for Prod. of Docs. to Deft., David M. Scoll dated May 27, 2004.

Respectfully submitted,

DAVID M. SCOLL

By his Attorneys,

/s/ Sara Discepolo

George C. Rockas, BBO # 544009

Sara Discepolo, BBO # 628721

WILSON, ELSER, MOSKOWITZ, EDELMAN &  
DICKER LLP

155 Federal Street

Boston, MA 02110

(617) 422-5300

Dated: September 27, 2004

ELIZABETH R. STEFFENBERG V. T. GENE GILMAN, ET AL.  
 UNITED STATES DISTRICT COURT  
 FOR THE DISTRICT OF MASSACHUSETTS  
 Civil Action No.: 04-40113 NMG

PRIVILEGE LOG FOR REQUEST # 1  
 OF PLAINTIFF'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS TO  
 DEFENDANT, DAVID M. SCOLL

AC = attorney client privilege; WP = work product; OP = opinion work product; JD = joint defense privilege

DATE	PRIVILEGE	DOCUMENT TYPE	PARTIES	DESCRIPTION
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SEE PRIVILEGE LOGS FOR REQUESTS # 1, 18-42.

ELIZABETH R. STEFFENBERG V. T. GENE GILMAN, ET AL.  
 UNITED STATES DISTRICT COURT  
 FOR THE DISTRICT OF MASSACHUSETTS  
 Civil Action No.: 04-40113 NMIG

PRIVILEGE LOG FOR REQUEST # 18  
 OF PLAINTIFF'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS TO  
 DEFENDANT, DAVID M. SCOLL

AC = attorney client privilege; WP = work product; OP = opinion work product; JD = joint defense privilege

DATE	PRIVILEGE	DOCUMENT TYPE	PARTIES	DESCRIPTION

SCOLL DOES NOT POSSESS ANY PRIVILEGED DOCUMENTS RESPONSIVE TO THIS REQUEST.

ELIZABETH R. STEFFENBERG V. T. GENE GILMAN, ET AL.  
UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS  
Civil Action No.: 04-40113 NMIG

PRIVILEGE LOG FOR REQUEST # 19  
OF PLAINTIFF'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS TO  
DEFENDANT, DAVID M. SCOLL

AC = attorney client privilege; WP = work product; JD = opinion work product; ID = joint defense privilege

DATE	PRIVILEGE	DOCUMENT TYPE	PARTIES	DESCRIPTION
10/19/2000	AC/WP/OP/JD	Attorney Notes	By Attorney Scoll	Notes concerning telephone conference with T. Gene Gilman re: concerning representation of T. Gene Gilman in connection with litigation
10/16/2000	AC/WP/OP/JD	Attorney Notes	By Attorney Scoll	Notes concerning telephone conference with T. Gene Gilman re: concerning representation of T. Gene Gilman in connection with litigation
9/19/2000	AC/WP/OP	Attorney Notes	By Attorney Scoll	Notes concerning telephone conference with T. Gene Gilman
7/6/1999	AC/JD	Invoice	By Attorney Scoll to T. Gene Gilman	Invoice to T. Gene Gilman for work performed 3/12/1999 to 3/16/99 (subject matter of telephone conference with client)
2/4/1999	AC/JD	Invoice	By Attorney Scoll to T. Gene Gilman	Invoice to T. Gene Gilman for work performed 9/4/1998 (subject matter of conference with client)
1/7/1999	WP/OP/JD	Invoice	By Attorney Scoll to T. Gene Gilman	Invoice to T. Gene Gilman for work performed 10/26/1998 to 11/20/1998 (subject matter of telephone conference with client's counsel)
8/16/1999	AC/JD	Invoice	By Attorney Scoll to T. Gene Gilman	Invoice to T. Gene Gilman for work performed 7/14/1999 to 8/13/1999 (subject matter of telephone conference with T. Gene Gilman)
7/6/1999	AC/JD	Invoice	By Attorney Scoll to T. Gene Gilman	Invoice to T. Gene Gilman for work performed 2/16/1999 to 6/29/1999 (subject matter of conferences with T. Gene Gilman)
2/4/1999	AC	Invoice	By Attorney Scoll to T. Gene Gilman	Invoice to T. Gene Gilman for work performed 1/11/1999 to 1/29/1999 (subject matter of conferences with T. Gene Gilman)
1/7/1999	AC	Invoice	By Attorney Scoll to T. Gene Gilman	Invoice to T. Gene Gilman for work performed 12/7/1998 to 12/10/1998 (subject matter of conference with client)
2/4/1999	AC	Invoice	By Attorney Scoll to T. Gene Gilman	Invoice to T. Gene Gilman for work performed 1/8/1999 (subject matter of conference with client)
4/3/2001	AC	Invoice	By Attorney Scoll to T. Gene Gilman	Invoice to T. Gene Gilman for work performed 1/31/2001 to 3/30/2001 (subject matter of conference with client's agent)
Printed on 11/13/2003	WP	Computer Generated Report	By Attorney Scoll	Client Billing Worksheet for T. Gene Gilman for work performed 10/6/1999 to 8/7/2000 (subject matter of telephone conference with client's counsel)
Printed on 11/13/2003	AC/WP	Computer Generated Report	By Attorney Scoll	Client Billing Worksheet for T. Gene Gilman for work performed 5/19/2003 to 11/5/2003 (subject matter of conference with client and client's counsel)



DATE	PRIVILEGE	DOCUMENT TYPE	PARTIES	DESCRIPTION
Printed on 11/13/2003	AC	Computer Generated Report	By Attorney Scoll	Client Billing Worksheet for T. Gene Gilman for work performed 8/26/1999 to 3/13/2000 (subject matter of conferences with client described)
Printed on 11/13/2003	AC/WP/OP/JD	Computer Generated Report	By Attorney Scoll	Client Billing Worksheet for T. Gene Gilman for work performed 1/27/2003 to 2/25/2003 (subject matter of conference with client and client's counsel)
6/7/1999	AC/WP/OP/JD	Attorney Notes	By Attorney Scoll	Agenda of Office Conference with T. Gene Gilman and written notes thereon reflecting client communications
Undated	AC/WP/JD	Diagram with Attorney Notes thereon	Created by T. Gene Gilman	Diagram reflects discussion between T. Gene Gilman and Attorney Scoll re: general matters related to corporations
3/30/1999	AC/WP/OP/JD	Attorney Notes	By Attorney Scoll	Notes on conference with T. Gene Gilman re: litigation involving T. Gene Gilman (Gene as a deponent and potential defendant)
3/12/1999	AC/WP/OP/JD	Attorney Notes	By Attorney Scoll	Notes on conference with T. Gene Gilman re: litigation involving T. Gene Gilman
2/16/2000	AC/WP/OP/JD	Correspondence	Letter from client's counsel to client with cc to Attorney Scoll	Letter and enclosed litigation documents (court filings) with attorney notes thereon (litigation in which T. Gene Gilman was a party)
3/1/2000	WP/OP/JD	Draft Litigation Documents	By counsel for client and Attorney Notes thereon	Draft Court Filings by client's counsel (litigation in which T. Gene Gilman was a party)
Printed on 3/1/2000	WP/OP/JD	Computer Generated Report	By counsel for client and Attorney Notes thereon	Report created for analysis of litigation (litigation in which T. Gene Gilman was a party)
January 2000	WP/OP/JD	Draft Litigation Documents	By counsel for client and Attorney Notes thereon	Draft Court Filings by client's counsel (litigation in which T. Gene Gilman was a party)
7/16/2001	AC/JD	Letter and attached invoice	From client's counsel to client	Re: litigation in which T. Gene Gilman was a party
6/27/2001	AC/JD	Letter	From client's counsel to client	Re: litigation in which T. Gene Gilman was a party
November 2000	AC/WP/JD	Notes	From T. Gene Gilman to Attorney Scoll	Giving background of case (prior litigation in which T. Gene Gilman was a party)
3/1/2001	AC/WP/OP/JD	Letter	From client's counsel to client	Re: litigation in which T. Gene Gilman was a party
1/30/2001	AC/JD	Letter (encloses 4 Settlement Agreements for client/client's agents to sign)	From client's counsel to client	Re: litigation in which T. Gene Gilman was a party
2/8/2001	AC/JD	Letter	From client's counsel to client	Re: litigation in which T. Gene Gilman was a party
2/12/2001	AC/JD	Letter	From client's counsel to client	Re: litigation in which T. Gene Gilman was a party
2/5/2001	AC/JD	Letter	From client's counsel to client	Re: litigation in which T. Gene Gilman was a party
1/31/2001	AC/JD	Letter	From client's counsel to client	Re: litigation in which T. Gene Gilman was a party
1/26/2001	AC/JD	Letter	From client's counsel to client	Re: litigation in which T. Gene Gilman was a party
1/26/2001	WP/OP/JD	Attorney Notes	By Attorney Scoll	Re: litigation in which T. Gene Gilman was a party
1/26/2001	AC/JD	Faemile	From client's counsel to client	Re: litigation in which T. Gene Gilman was a party
1/26/2001	AC/JD	Faemile	From client's counsel to client	Re: litigation in which T. Gene Gilman was a party

DATE	PRIVILEGE	DOCUMENT TYPE	PARTIES	DESCRIPTION
1/26/2001	AC/JD	Letter	From client's counsel to client and Attorney Scoll	Re: litigation in which T. Gene Gilman was a party
1/26/2001	AC/JD	Facsimile	From client's counsel to client	Re: litigation in which T. Gene Gilman was a party
1/26/2001	AC/JD	Facsimile	From client's counsel to client	Re: litigation in which T. Gene Gilman was a party
1/26/2001	AC/JD	Letter	From client's counsel to client and Attorney Scoll	Re: litigation in which T. Gene Gilman was a party
1/22/2001	AC/WP/OP/JD	Attorney Notes	By Attorney Scoll	Notes on telephone conference with T. Gene Gilman and client's counsel (re: litigation in which T. Gene Gilman was a party)
1/22/2001	AC/WP/OP/JD	Letter	From client's counsel to client with cc to Attorney Scoll and other counsel to client	Re: litigation in which T. Gene Gilman was a party
1/5/2001	AC/WP/OP/JD	Letter	From client's counsel to client with cc to Attorney Scoll and other counsel to client	Re: litigation in which T. Gene Gilman was a party
12/21/2000	AC/JD	Letter	From client's counsel to client with cc to Attorney Scoll and other counsel to client	Re: litigation in which T. Gene Gilman was a party
12/27/2000	AC/JD	Letter	From client's counsel to client and Attorney Scoll with cc to client's other counsel	Re: litigation in which T. Gene Gilman was a party
12/5/2000	AC/JD	Facsimile	From T. Gene Gilman to Attorney Scoll	Re: litigation in which T. Gene Gilman was a party
11/22/2000	AC/JD	Letter	From client's counsel to client and Attorney Scoll with cc to client's other counsel	Re: litigation in which T. Gene Gilman was a party
11/29/2000	AC/WP/OP/JD	Letter	From client's counsel to client with cc to Attorney Scoll and client's other counsel	Re: litigation in which T. Gene Gilman was a party
11/29/2000	AC/JD	Letter	From client's counsel to client with cc to Attorney Scoll and client's other counsel	Re: litigation in which T. Gene Gilman was a party
11/29/2000	AC/WP/OP/JD	Email	From Attorney Scoll to client's counsel	Email concerning meeting with T. Gene Gilman Re: litigation in which T. Gene Gilman was a party
11/28/2000	AC/WP/OP/JD	Email	From client's counsel to Attorney Scoll and client	Re: litigation in which T. Gene Gilman was a party (includes information about meeting with T. Gene Gilman)
10/31/2000	AC/JD	Letter	From client's counsel to client with cc to Attorney Scoll and client's other counsel	Re: litigation in which T. Gene Gilman was a party
10/27/2000	AC/JD	Letter	From client's counsel to client	Re: litigation in which T. Gene Gilman was a party
10/30/2000	AC/WP/OP/JD	Letter	From client's counsel to client with cc to Attorney Scoll and client's other counsel	Re: litigation in which T. Gene Gilman was a party
11/10/2000	WP/OP/JD	Email	From client's counsel to client's other counsel with cc to client and Attorney Scoll	Re: litigation in which T. Gene Gilman was a party



DATE	PRIVILEGE	DOCUMENT TYPE	PARTIES	DESCRIPTION
11/1/2000	AC/JD	Letter	From client's counsel to client with cc to Attorney Scoll and client's other counsel	Re: litigation in which T. Gene Gilman was a party
11/1/2000	AC/JD	Letter	From client's counsel to client with cc to Attorney Scoll and client's other counsel	Re: litigation in which T. Gene Gilman was a party
10/20/2000	AC/JD	Letter	From client's counsel to client with cc to Attorney Scoll and client's other counsel	Re: litigation in which T. Gene Gilman was a party
10/18/1999	AC/JD	Letter	From client's counsel to client	Re: litigation in which T. Gene Gilman was a party
10/13/2000	AC/JD	Invoice	From client's counsel to client	Invoice contains content of communication between client's counsel and T. Gene Gilman
10/17/2000	AC/JD	Email	From client to client's counsel	Re: litigation in which T. Gene Gilman was a party
10/20/2000	AC/JD	Letter	From client's counsel to client	Re: litigation in which T. Gene Gilman was a party
9/28/2000	AC/WP/OP/JD	Letter	From client's counsel to client with cc to Attorney Scoll and client's other counsel	Re: litigation in which T. Gene Gilman was a party
9/28/2000	AC/WP/OP/JD	Letter	From client's counsel to client with cc to Attorney Scoll and client's other counsel	Re: litigation in which T. Gene Gilman was a party
9/19/2000	AC/JD	Letter	From client's counsel to client with cc to Attorney Scoll and client's other counsel	Re: litigation in which T. Gene Gilman was a party
9/13/2000	AC/JD	Invoice	From client's counsel to client c/o client's other counsel	Re: litigation in which T. Gene Gilman was a party
9/11/2000	AC/JD	Letter	From client's counsel to client with cc to Attorney Scoll and client's other counsel	Re: litigation in which T. Gene Gilman was a party
9/11/2000	AC/JD	Invoice	From client's counsel to client	Re: litigation in which T. Gene Gilman was a party
8/16/2000	AC/WP/OP/JD	Letter	From client's counsel to client and Attorney Scoll with cc to client's other counsel	Re: litigation in which T. Gene Gilman was a party
8/1/2000	AC/JD	Letter	From client's counsel to client and Attorney Scoll with cc to client's other counsel	Re: litigation in which T. Gene Gilman was a party
8/1/2000	AC/WP/OP/JD	Letter	From client's counsel to client and Attorney Scoll with cc to client's other counsel	Re: litigation in which T. Gene Gilman was a party
7/13/2000	AC/WP/OP/JD	Letter	From client's counsel to client with cc to Attorney Scoll and client's other counsel	Re: litigation in which T. Gene Gilman was a party
7/13/2000	AC/WP/OP/JD	Letter	From client's counsel to client with cc to Attorney Scoll and client's other counsel	Re: litigation in which T. Gene Gilman was a party
7/7/2000	AC/WP/OP/JD	Email	From client's counsel to client and Attorney Scoll with cc to client's other counsel	Re: litigation in which T. Gene Gilman was a party



DATE	PRIVILEGE	DOCUMENT TYPE	PARTIES	DESCRIPTION
Undated	WP/OP/JD	Email File Attachment	From client's counsel to client and Attorney Scoll with cc to client's other counsel	Draft Court Filing with Attorney Notes thereon re: litigation in which T. Gene Gilman was a party
7/13/2000	AC/WP/OP/JD	Letter	From client's counsel to client with cc to Attorney Scoll and client's other counsel	Re: litigation in which T. Gene Gilman was a party
7/10/2000	AC/JD	Facsimile	From client's counsel to client with cc to Attorney Scoll	Re: litigation in which T. Gene Gilman was a party
7/7/2000	WP/OP/JD	Letter	From opposing counsel to client's counsel	Correspondence with Attorney Notes thereon
7/27/2000	AC/JD	Facsimile	From client's counsel to client with cc to Attorney Scoll	Re: litigation in which T. Gene Gilman was a party
7/27/2000	AC/JD	Facsimile	From client's counsel to client with cc to Attorney Scoll	Re: litigation in which T. Gene Gilman was a party
12/6/1999	WP/OP/JD	Faxed Court Filings	From opposing counsel to Attorney Scoll	Court Filings attached contain Attorney Notes thereon
6/21/2000	AC/JD	Facsimile	From client's counsel to client and Attorney Scoll	Re: litigation in which T. Gene Gilman was a party
6/12/2000	AC/JD	Letter	From client's counsel to client with cc to Attorney Scoll and client's other counsel	Re: litigation in which T. Gene Gilman was a party
6/12/2000	AC/WP/OP/JD	Facsimile	From client's counsel to client with cc to Attorney Scoll	Re: litigation in which T. Gene Gilman was a party
6/12/2000	WP/OP/JD	Draft Letter	Drafted by client's counsel	Re: litigation in which T. Gene Gilman was a party
4/21/2000	AC/WP/OP/JD	Letter	From client's counsel to client with cc to Attorney Scoll	Re: litigation in which T. Gene Gilman was a party
4/20/2000	WP/OP/JD	Facsimile	From Attorney Scoll to client's counsel with cc to client	Re: litigation in which T. Gene Gilman was a party
4/6/2000	AC/WP/OP/JD	Facsimile	From client's counsel to Attorney Scoll	Discussing subject matter of what Attorney Scoll will discuss with T. Gene Gilman (re: litigation in which T. Gene Gilman was a party)
4/18/2000	WP/OP/JD	Draft Agreements	Drafted by client's counsel with Attorney Notes thereon	Re: litigation in which T. Gene Gilman was a party
4/5/2000	AC/JD	Letter	From client's counsel to client with cc to Attorney Scoll	Re: litigation in which T. Gene Gilman was a party
3/15/2000	AC/WP/OP/JD	Letter	From client's counsel to client with cc to Attorney Scoll and client's other counsel	Re: litigation in which T. Gene Gilman was a party
3/13/2000	WP/OP/JD	Facsimile	From Attorney Scoll to client's counsel	Re: litigation in which T. Gene Gilman was a party
2/28/2000	WP/OP/JD	Facsimile	From Attorney Scoll to client's counsel	Re: litigation in which T. Gene Gilman was a party
2/24/2000	AC/JD	Facsimile	From client's counsel to client with cc to Attorney Scoll and client's other counsel	Re: litigation in which T. Gene Gilman was a party
2/24/2000	AC/JD	Letter	From client's counsel to client with cc to Attorney Scoll and client's other counsel	Re: litigation in which T. Gene Gilman was a party

DATE	PRIVILEGE	DOCUMENT TYPE	PARTIES	DESCRIPTION
2/14/2000	AC/JD	Letter	From client's counsel to client with cc to Attorney Scoll and client's other counsel	Re: litigation in which T. Gene Gilman was a party
2/9/2000	AC/WP/OP/JD	Letter	From client's counsel to client with cc to Attorney Scoll and client's other counsel	Re: litigation in which T. Gene Gilman was a party
2/10/2000	AC/WP/OP/JD	Letter	From client's counsel to client with cc to Attorney Scoll and client's other counsel	Re: litigation in which T. Gene Gilman was a party
2/7/2000	AC/JD	Letter	From client's counsel to client with cc to Attorney Scoll and client's other counsel	Re: litigation in which T. Gene Gilman was a party
2/7/2000	AC/WP/OP/JD	Letter	From client's counsel to client with cc to client's other counsel	Re: litigation in which T. Gene Gilman was a party
2/7/2000	AC/WP/OP/JD	Letter	From client's counsel to client with cc to client's other counsel	Re: litigation in which T. Gene Gilman was a party
1/31/2000	WP/OP/JD	Email	Between client's counsel	Re: litigation in which T. Gene Gilman was a party
1/27/2000	WP/OP/JD	Email	From client's counsel to Attorney Scoll	Re: litigation in which T. Gene Gilman was a party
1/14/2000	AC/WP/OP/JD	Letter	Between client's counsel with cc to client, Attorney Scoll, and client's other counsel	Re: litigation in which T. Gene Gilman was a party
12/17/1999	AC/WP/OP/JD	Letter	From Attorney Scoll to client's counsel with cc to client	Re: litigation in which T. Gene Gilman was a party (reflects in part communication by T. Gene Gilman)
12/6/1999	WP/OP/JD	Letter	From opposing counsel to Attorney Scoll	Re: litigation in which T. Gene Gilman was a party (contains Attorney Notes thereon)
12/7/1999	AC/JD	Facsimile	From Attorney Scoll to T. Gene Gilman	Re: litigation in which T. Gene Gilman was a party
12/7/1999	AC/JD	Facsimile	From Attorney Scoll to Steve Gilman	Re: litigation involving Arbor Securities and in which T. Gene Gilman was a party (contains Attorney Notes thereon)
11/23/1999	WP/OP/JD	Interoffice Memo	Attorney Scoll's Office	Re: litigation in which T. Gene Gilman was a party
9/23/1999	WP/OP/JD	Letter	From Attorney Scoll to client's counsel	Re: litigation in which T. Gene Gilman was a party
9/18/2000	AC/WP/OP/JD	Attorney Notes	By Attorney Scoll	Notes on conference with T. Gene Gilman re: litigation in which T. Gene Gilman was a party
8/23/2000	WP/OP/JD	Attorney Notes	By Attorney Scoll	Re: litigation in which T. Gene Gilman was a party
8/23/2000	WP/OP/JD	Attorney Notes	By Attorney Scoll	Conference with client's counsel re: litigation in which T. Gene Gilman was a party
7/1/2000	WP/OP/JD	Attorney Notes	By Attorney Scoll	Re: litigation in which T. Gene Gilman was a party/witness
6/21/2000	WP/OP/JD	Attorney Notes	By Attorney Scoll	Notes on conference with client's counsel re: litigation in which T. Gene Gilman was a party
6/22/2000	AC/WP/OP/JD	Attorney Notes	By Attorney Scoll	Notes include conference with client's counsel and information on conference call with T. Gene Gilman re: litigation in which T. Gene Gilman was a party
5/4/2000	WP/OP/JD	Attorney Notes	By Attorney Scoll	Re: litigation in which T. Gene Gilman was a party/witness



DATE	PRIVILEGE	DOCUMENT TYPE	PARTIES	DESCRIPTION
3/24/2000	WP/OP/JD	Attorney Notes	By Attorney Scoll	Notes on conference with client's counsel re: litigation in which T. Gene Gilman was a party
3/14/2000	WP/OP/JD	Attorney Notes	By Attorney Scoll	Notes on conference with client's counsel re: litigation in which T. Gene Gilman was a party
4/3/2000	AC/WP/OP/JD	Attorney Notes	By Attorney Scoll	Notes on conference with T. Gene Gilman and conference with client's counsel re: litigation in which T. Gene Gilman was a party
3/30/2000	WP/OP/JD	Attorney Notes	By Attorney Scoll	Notes on conference with client's counsel re: prior litigation in which T. Gene Gilman was a party
3/28/2000	AC/WP/OP/JD	Attorney Notes	By Attorney Scoll	Notes on conference with T. Gene Gilman and conference with client's counsel re: litigation in which T. Gene Gilman was a party
3/21/2000	WP/OP/JD	Attorney Notes	By Attorney Scoll	Notes on conference with client's counsel re: prior litigation in which T. Gene Gilman was a party
2/28/2000	WP/OP/JD	Attorney Notes	By Attorney Scoll	Notes on conference with client's counsel re: prior litigation in which T. Gene Gilman was a party
2/28/2000	AC/WP/OP/JD	Attorney Notes	By Attorney Scoll	Attorney Notes reflecting conference with Scoll Gilman re: general corporate issues for T. Gene Gilman
2/25/2000	WP/OP/JD	Attorney Notes	By Attorney Scoll	Notes on conference with client's counsel re: litigation in which T. Gene Gilman was a party
2/23/2000	AC/WP/OP/JD	Attorney Notes	By Attorney Scoll	Notes on conference with T. Gene Gilman and conference with client's counsel re: litigation in which T. Gene Gilman was a party
2/22/2000	AC/WP/OP/JD	Attorney Notes	By Attorney Scoll	Notes on conference with T. Gene Gilman re: litigation in which T. Gene Gilman was a party
9/16/1999	AC/WP/OP/JD	Attorney Notes	By Attorney Scoll	Notes on conference with T. Gene Gilman re: litigation in which T. Gene Gilman was a party
9/14/1999	AC/WP/OP/JD	Attorney Notes	By Attorney Scoll	Notes on conference with T. Gene Gilman re: litigation in which T. Gene Gilman was a party
9/14/1999	AC/WP/OP/JD	Attorney Notes	By Attorney Scoll	Notes on conference with T. Gene Gilman re: litigation in which T. Gene Gilman was a party
9/11/1999	AC/WP/OP/JD	Attorney Notes	By Attorney Scoll	Notes on conference with T. Gene Gilman re: litigation in which T. Gene Gilman was a party
9/10/1999	WP/OP/JD	Attorney Notes	By Attorney Scoll	Notes on conference with T. Gene Gilman re: litigation in which T. Gene Gilman was a party
6/2/1999	WP	Faxed Correspondence/Legal Document with Notes thereon	Notes by T. Gene Gilman	Notes on conference with opposing counsel re: litigation in which T. Gene Gilman was a party
Undated	WP/OP/JD	Attorney Notes	By Attorney Scoll	Re: personal business matters pertaining to T. Gene Gilman
9/5/2000	AC/WP/OP/JD	Facsimile	From Attorney Scoll to client's counsel	Re: personal business matters pertaining to T. Gene Gilman
8/15/2000	WP/OP/JD	Court Filings	Drafted by client's counsel	Contains information communicated to Attorney Scoll from Steve Gilman, agent of corporate clients
Undated	WP/OP/JD	Draft Court Filings	Drafted by client's counsel	Re: prior litigation in which T. Gene Gilman was a party
				Re: litigation in which T. Gene Gilman was a party – documents contain written Attorney Notes by Attorney Scoll
				Re: litigation in which T. Gene Gilman was a party – drafts contain written Attorney Notes by Attorney Scoll



DATE	PRIVILEGE	DOCUMENT TYPE	PARTIES	DESCRIPTION
9/5/2000	AC/WP/OP/JD	Facsimile	From Attorney Scoll to client's counsel	Re: litigation in which T. Gene Gilman was a party Contains information communicated to Attorney Scoll from Steve Gilman, agent of corporate clients
Printed on 10/7/1996	WP	Computer Generated Report		Re: in anticipation of litigation involving T. Gene Gilman (with written Notes thereon)
3/16/2000	AC/JD	Facsimile	From Steve Gilman, agent for corporate client, to Attorney Scoll	Re: litigation in which T. Gene Gilman was a party
3/16/2000	AC/WP/JD	Faxed Computer Generated Report	From T. Gene Gilman or corporate client to Attorney Scoll	Report created for litigation in which T. Gene Gilman was a party and which involved corporate client. Faxed by either T. Gene Gilman or agent for corporate client.
Printed on 3/17/2000	WP/JD	Computer Generated Reports		Reports created for litigation in which T. Gene Gilman was a party and which involved corporate client
Undated	AC/WP/JD	Written Note on Computer Generated Report	From client to Attorney Scoll	Report and Note concerning litigation in which T. Gene Gilman was a party and which involved corporate client.
6/6/2000	WP/OP/JD	Attorney Notes	By Attorney Scoll	Re: Notes concerning litigation in which T. Gene Gilman was a party and which involved corporate client.
5/4/2000	WP/OP/JD	Facsimile	From Attorney Scoll to client's counsel	Re: litigation in which T. Gene Gilman was a party and which involved corporate client.
4/28/2000	WP/OP/JD	Facsimile	From client's counsel to Attorney Scoll	Re: litigation in which T. Gene Gilman was a party and which involved corporate client.
Printed on 3/1/2000	WP/OP/JD	Computer printout of website pages	Created by Attorney Scoll	Printouts have Attorney Notes thereon. Printouts downloaded for litigation in which T. Gene Gilman was a party and which involved corporate client.
2/22/2000	AC/WP/OP/JD	Facsimile	From client's counsel to client with cc to Attorney Scoll	Re: litigation in which T. Gene Gilman was a party and which involved corporate client.
2/18/2000	WP/OP/JD	Letter	From opposing counsel to client's counsel	Letter concerning litigation in which T. Gene Gilman was a party and which involved corporate client. Letter contains Attorney Notations written thereon.
2/22/2000	WP/OP/JD	Facsimile with attached documents	From client's counsel to Attorney Scoll	Documents contain Attorney Notes written thereon re: litigation in which T. Gene Gilman was a party and which involved corporate client.
Undated	WP/OP/JD	Blank Agreement with Attorney Notes thereon		Re: litigation in which T. Gene Gilman was a client and which involved corporate client.
5/4/2000	AC/WP/JD	Facsimile	From T. Gene Gilman to Attorney Scoll	Re: litigation in which T. Gene Gilman was a party
9/20/1999	AC/JD	Facsimile	From Attorney Scoll to T. Gene Gilman	Re: litigation in which T. Gene Gilman was a client and which involved corporate client.
Undated	WP/OP/JD	Computer Generated Report		Created for litigation in which T. Gene Gilman was a party and which involved corporate client
Undated	WP/OP/JD	Computer Generated Report		Created for litigation in which T. Gene Gilman was a party and which involved corporate client
Undated	WP/OP/JD	Draft Letter	By Attorney Scoll	Re: personal legal transaction for T. Gene Gilman and Diane Gilman
Undated	WP/OP/JD	Attorney Notes	By Attorney Scoll	Re: personal legal transaction for T. Gene Gilman and Diane Gilman

DATE	PRIVILEGE	DOCUMENT TYPE	PARTIES	DESCRIPTION
8/5/1986	WP/OP/JD	Attorney Notes	By Attorney Scoll	Re: personal legal transaction for T. Gene Gilman and Diane Gilman
Undated	WP/OP/JD	Attorney Notes	By Attorney Scoll	Re: personal legal transaction for T. Gene Gilman and Diane Gilman
7/29/1986	AC	Memo	From T. Gene Gilman to Attorney Scoll	Re: personal legal transaction for T. Gene Gilman and Diane Gilman
June 1986	WP/OP/JD	Draft Agreement with Attorney Notes thereon		Re: personal legal transaction for T. Gene Gilman and Diane Gilman
7/1/1986	AC	Invoice	From Attorney Scoll to T. Gene Gilman	Re: personal legal transaction for T. Gene Gilman and Diane Gilman
8/25/1986	WP/OP/JD	Attorney Notes	By Attorney Scoll	Re: personal legal transaction for T. Gene Gilman and Diane Gilman
1/12/1988	WP/OP	Attorney Notes	By Attorney Scoll	Notes concerning personal legal matter for T. Gene Gilman (potential for litigation)
11/2/1987	AC/WP/OP	Letter	From Attorney Scoll to T. Gene Gilman	Re: personal legal matter for T. Gene Gilman (potential for litigation)
Undated	WP/OP	Research Materials	Compiled by Attorney Scoll	Re: personal legal matter for T. Gene Gilman (potential for litigation)
10/27/1987	AC/WP/OP	Attorney Notes	By Attorney Scoll	Re: personal legal matter for T. Gene Gilman (potential for litigation)
Undated (Received on 10/9/1987)	AC/WP	Letter	From T. Gene Gilman to Attorney Scoll	Re: personal legal matter for T. Gene Gilman (potential for litigation)
8/21/1987	AC/WP/OP/JD	Attorney Notes	By Attorney Scoll	Notes concerning communications from T. Gene Gilman to Attorney Scoll re: personal legal matter for T. Gene Gilman (potential for litigation)
Undated	WP/OP	Draft Letter	Drafted by Attorney Scoll	Re: personal legal matter for T. Gene Gilman (potential for litigation)
Undated	WP/OP	Attorney Notes	By Attorney Scoll	For representation of T. Gene Gilman as shareholder/director of newly formed corporation
7/19/1941	AC/JD	Letter	From Attorney Scoll to T. Gene and Diane Gilman	Re: personal legal transaction for T. Gene Gilman and Diane Gilman
5/8/1985	AC/JD	Invoice	From Attorney Scoll to T. Gene and Diane Gilman	Re: personal legal transaction for T. Gene Gilman and Diane Gilman (contains information concerning telephone conversation with T. Gene Gilman)
2/13/1985	AC/JD	Attorney Timeslip	By Attorney Scoll	Re: personal legal transaction for T. Gene Gilman and Diane Gilman (contains information concerning telephone conversation with T. Gene Gilman)
7/9/1985	AC/JD	Invoice	From Attorney Scoll to T. Gene and Diane Gilman	Re: personal legal transaction for T. Gene Gilman and Diane Gilman (contains information concerning telephone conversation with T. Gene Gilman)
6/3/1985	AC/JD	Attorney Timeslip	From Attorney Scoll to T. Gene and Diane Gilman	Re: personal legal transaction for T. Gene Gilman and Diane Gilman (contains information concerning telephone conversation with T. Gene Gilman)
6/19/1985	WP/OP	Attorney Notes	By Attorney Scoll	Re: personal legal transaction for T. Gene Gilman and Diane Gilman
Undated	WP/OP	Attorney Notes	By Attorney Scoll	Re: personal legal transaction for T. Gene Gilman and Diane Gilman
6/18/1985	WP/OP	Attorney Notes	By Attorney Scoll	Re: personal legal transaction for T. Gene Gilman and Diane Gilman



DATE	PRIVILEGE	DOCUMENT TYPE	PARTIES	DESCRIPTION
6/19/1985	WP/OP	Attorney Notes	By Attorney Scoll	Re: personal legal transaction for T. Gene Gilman and Diane Gilman
2/13/1985	WP/OP	Attorney Notes	By Attorney Scoll	Re: personal legal transaction for T. Gene Gilman and Diane Gilman
2/12/1985	WP/OP	Attorney Notes	By Attorney Scoll	Re: personal legal transaction for T. Gene Gilman and Diane Gilman
2/7/1985	WP/OP	Attorney Notes	By Attorney Scoll	Re: personal legal transaction for T. Gene Gilman and Diane Gilman
1/21/1986	AC	Memo	From T. Gene Gilman to Attorney Scoll	Re: personal legal matter for T. Gene Gilman and Diane Gilman
1/15/1986	AC	Letter	From Attorney Scoll to T. Gene Gilman and Gilman	Re: personal legal matter for T. Gene Gilman and Diane Gilman
8/29/1985	AC/WP/OP	Attorney Notes	By Attorney Scoll	Notes on telephone conference with T. Gene Gilman Re: personal legal matter for T. Gene Gilman and Diane Gilman
8/27/1985	AC/WP/OP	Letter	From Attorney Scoll to T. Gene Gilman	Re: personal legal matter for T. Gene Gilman and Diane Gilman
Undated	WP/OP	Attorney Notes	By Attorney Scoll	Re: personal legal matter for T. Gene Gilman and Diane Gilman
Undated	WP/OP	Attorney Notes	By Attorney Scoll	Re: personal legal matter for T. Gene Gilman, Diane Gilman, and David Gelfond
2/22/1982	WP/OP	Attorney Notes	By Attorney Scoll	Re: personal legal matter for T. Gene Gilman, Diane Gilman, and David Gelfond
2/19/1982	WP/OP	Attorney Notes	By Attorney Scoll	Re: personal legal matter for T. Gene Gilman, Diane Gilman, and David Gelfond
2/11/1982	WP/OP	Attorney Notes	By Attorney Scoll	Re: personal legal matter for T. Gene Gilman, Diane Gilman, and David Gelfond
2/1/1982	AC	Letter	From Attorney Scoll to T. Gene Gilman and Diane Gilman	Re: personal legal matter for T. Gene Gilman, Diane Gilman, and David Gelfond
1/13/1982	AC	Letter	From Attorney Scoll to T. Gene Gilman and Diane Gilman	Re: personal legal matter for T. Gene Gilman, Diane Gilman, and David Gelfond
12/22/1981	AC	Attorney Timeslip	By Attorney Scoll	Timeslip contains information on conference with T. Gene Gilman Re: personal legal matter for T. Gene and Diane Gilman, and David Gelfond
12/30/1981	AC	Letter	By Attorney Scoll to T. Gene Gilman and Diane Gilman	Re: personal legal matter for T. Gene Gilman, Diane Gilman, and David Gelfond
Undated	WP/OP	Draft Legal Document with Attorney Notes thereon	By Attorney Scoll	Re: personal legal matter for T. Gene Gilman, Diane Gilman, and David Gelfond
7/9/1985	AC	Invoice	From Attorney Scoll to Mr. and Mrs. Gene Gilman	Invoice for personal legal matter for T. Gene Gilman and Diane Gilman (includes information on content of conference with T. Gene Gilman)
4/11/1985	AC	Attorney Timeslip	By Attorney Scoll	Time and Billing information re: personal legal matter for T. Gene Gilman and Diane Gilman (includes information on content of conference with T. Gene Gilman)
Undated	WP/OP	Attorney Notes	By Attorney Scoll	Re: personal legal matter for T. Gene Gilman and Diane Gilman
6/19/1985	WP/OP	Attorney Notes	By Attorney Scoll	Re: personal legal matter for T. Gene Gilman and Diane Gilman



DATE	PRIVILEGE	DOCUMENT TYPE	PARTIES	DESCRIPTION
5/8/1985	AC	Invoice	From Attorney Scoll to Mr. and Mrs. Gene Gilman	Re: personal legal matter for T. Gene Gilman and Diane Gilman (includes information on content of conference with T. Gene Gilman)
4/11/1985	WP/OP	Attorney Notes	By Attorney Scoll	Re: personal legal matter for T. Gene Gilman and Diane Gilman
Undated	WP/OP	Research Materials	By Attorney Scoll	Re: general legal issues for T. Gene Gilman
Undated	WP/OP	Attorney Notes	By Attorney Scoll	Re: personal legal matter for T. Gene Gilman and Diane Gilman
Undated	WP/OP	Attorney Notes	By Attorney Scoll	Re: personal legal matter for T. Gene Gilman and Diane Gilman
8/25/1986	WP/OP	Attorney Notes	By Attorney Scoll	Re: personal legal matter for T. Gene Gilman and Diane Gilman
Undated	WP/OP	Draft Legal Document with Attorney Notes thereon	By Attorney Scoll	Re: personal legal matter for T. Gene Gilman and Diane Gilman
8/5/1986	WP/OP	Attorney Notes	By Attorney Scoll	Re: personal legal matter for T. Gene Gilman and Diane Gilman
8/25/1986	AC	Attorney Timeslip	By Attorney Scoll	Time and Billing Slip containing information on content of conference with T. Gene Gilman re: personal legal matter for T. Gene and Diane Gilman
7/1/1986	AC	Invoice	From Attorney Scoll to T. Gene Gilman	Invoice containing information on content of conference with T. Gene Gilman re: personal legal matter for T. Gene and Diane Gilman
6/12/1986	AC	Attorney Timeslip	By Attorney Scoll	Time and Billing Slip containing information on content of conference with T. Gene Gilman re: personal legal matter for T. Gene and Diane Gilman
4/27/1984	AC	Attorney Timeslip	By Attorney Scoll	Time and Billing Slip containing information on content of conference with T. Gene Gilman re: personal legal matter for T. Gene and Diane Gilman
5/15/1984	AC	Attorney Timeslip	By Attorney Scoll	Time and Billing Slip containing information on content of conference with T. Gene Gilman re: personal legal matter for T. Gene and Diane Gilman
5/21/1984	AC	Attorney Timeslip	By Attorney Scoll	Time and Billing Slip containing information on content of conference with T. Gene Gilman re: personal legal matter for T. Gene and Diane Gilman
7/2/1984	AC	Attorney Timeslip	By Attorney Scoll	Time and Billing Slip containing information on content of conference with T. Gene Gilman re: personal legal matter for T. Gene and Diane Gilman
7/6/1984	AC	Attorney Timeslip	By Attorney Scoll	Time and Billing Slip containing information on content of conference with T. Gene Gilman re: personal legal matter for T. Gene and Diane Gilman
7/26/1984	WP/OP	Attorney Notes	By Attorney Scoll	Re: personal legal matter for T. Gene Gilman and Diane Gilman
7/6/1984	WP/OP	Attorney Notes	By Attorney Scoll	Re: personal legal matter for T. Gene Gilman and Diane Gilman
6/21/1984	WP/OP	Attorney Notes	By Attorney Scoll	Re: personal legal matter for T. Gene Gilman and Diane Gilman
6/28/1984	WP/OP	Attorney Notes	By Attorney Scoll	Re: personal legal matter for T. Gene Gilman and Diane Gilman

DATE	PRIVILEGE	DOCUMENT TYPE	PARTIES	DESCRIPTION
Undated	WP/OP	Attorney Notes	By Attorney Scoll	Re: personal legal matter for T. Gene Gilman and Diane Gilman
6/18/1984	WP/OP	Attorney Notes	By Attorney Scoll	Re: personal legal matter for T. Gene Gilman and Diane Gilman
6/14/1984	WP/OP	Attorney Notes	By Attorney Scoll	Re: personal legal matter for T. Gene Gilman and Diane Gilman
Undated	WP/OP	Legal Research Materials with Attorney Notes thereon	By Attorney Scoll	Re: personal legal matter for T. Gene Gilman and Diane Gilman
6/5/1984	WP/OP	Attorney Notes	By Attorney Scoll	Re: personal legal matter for T. Gene Gilman and Diane Gilman
6/4/1984	WP/OP	Attorney Notes	By Attorney Scoll	Re: personal legal matter for T. Gene Gilman and Diane Gilman
6/11/1984	WP/OP	Attorney Notes	By Attorney Scoll	Re: personal legal matter for T. Gene Gilman and Diane Gilman
5/31/1984	WP/OP	Attorney Notes	By Attorney Scoll	Re: personal legal matter for T. Gene Gilman and Diane Gilman
5/30/1984	WP/OP	Attorney Notes	By Attorney Scoll	Re: personal legal matter for T. Gene Gilman and Diane Gilman
5/22/1984	WP/OP	Attorney Notes	By Attorney Scoll	Re: personal legal matter for T. Gene Gilman and Diane Gilman
Undated	WP/OP	Draft Legal Document with Attorney Notes thereon	By Attorney Scoll	Re: personal legal matter for T. Gene Gilman and Diane Gilman
3/28/1984	WP/OP	Attorney Notes	By Attorney Scoll	Re: personal legal matter for T. Gene Gilman and Diane Gilman
3/16/1999	WP/OP/JD	Attorney Notes	By Attorney Scoll	Re: representation of T. Gene Gilman in litigation
7/23/1998	AC/WP/OP/JD	Letter	From client's counsel to client with cc to Attorney Scoll	Re: representation of T. Gene Gilman in litigation
7/23/1998	AC/WP/OP/JD	Letter	From client's counsel to client with cc to Attorney Scoll	Re: representation of T. Gene Gilman in litigation
6/23/1998	WP/OP/JD	Letter	From client's counsel to Attorney Scoll	Re: representation of T. Gene Gilman in litigation
6/23/1998	WP/OP/JD	Draft Legal Document	By client's counsel with Attorney Notes thereon by Attorney Scoll	Re: representation of T. Gene Gilman in litigation
6/29/1998	AC/WP/OP/JD	Letter	From client's counsel to T. Gene Gilman with cc to Attorney Scoll	Re: representation of T. Gene Gilman in litigation
7/9/1998	WP/OP/JD	Facsimile	From Attorney Scoll to client's counsel	Re: representation of T. Gene Gilman in litigation
6/23/1998	WP/OP/JD	Draft Legal Document with Attorney Notes thereon	Draft by client's counsel; Notes by Attorney Scoll	Re: representation of T. Gene Gilman in litigation
7/6/1998	AC/WP/OP/JD	Facsimile	From Attorney Scoll to T. Gene Gilman	Re: representation of T. Gene Gilman in litigation
Undated	WP/OP/JD	Draft Legal Document	By client's counsel	Re: representation of T. Gene Gilman in litigation
7/9/1998	WP/OP/JD	Attorney Notes	By Attorney Scoll	Re: representation of T. Gene Gilman in litigation
6/26/1998	AC/WP/OP/JD	Attorney Notes	By Attorney Scoll	Notes on content of conference with Steve Gilman and T. Gene Gilman re: representation of T. Gene Gilman in litigation
6/22/1998	AC/WP/OP/JD	Attorney Notes	By Attorney Scoll	Notes on content of conference with client's counsel



DATE	PRIVILEGE	DOCUMENT TYPE	PARTIES	DESCRIPTION
				and T. Gene Gilman re: representation of T. Gene Gilman in litigation
Undated	WP/OP/JD	Notes	By T. Gene Gilman	Notes concerning matters in litigation for which Attorney Scoll and other counsel providing representation to T. Gene Gilman
6/2/1998	AC/WP/OP/JD	Faxed Attorney Notes	Notes by client's counsel faxed to Attorney Scoll	Notes include content of conference with T. Gene Gilman re: representation of T. Gene Gilman in litigation
6/9/1998	AC/WP/OP/JD	Facsimile	From Steve Gilman to Attorney Scoll	Re: representation of T. Gene Gilman in connection with litigation
6/12/1998	AC/WP/OP/JD	Attorney Notes	By Attorney Scoll	Notes include content of conference with T. Gene Gilman re: representation of T. Gene Gilman in connection with litigation
6/18/1998	WP/OP/JD	Attorney Notes	By Attorney Scoll	Re: representation of T. Gene Gilman in connection with litigation (includes content of conference with client's counsel)
6/18/1998	AC/WP/OP/JD	Attorney Notes	By Attorney Scoll	Notes include content of conference with T. Gene Gilman and client's counsel re: representation of T. Gene Gilman in connection with litigation
6/17/1998	AC/WP/OP/JD	Attorney Notes	By Attorney Scoll	Notes include content of conference with T. Gene Gilman and client's counsel re: representation of T. Gene Gilman in connection with litigation
6/17/1998	WP/OP/JD	Attorney Notes	By Attorney Scoll	Re: representation of T. Gene Gilman in connection with litigation
6/16/1998	WP/OP/JD	Attorney Notes	By Attorney Scoll	Re: representation of T. Gene Gilman in connection with litigation
6/9/1998	AC/WP/OP/JD	Attorney Notes	By Attorney Scoll	Notes include content of conference with T. Gene Gilman re: representation of T. Gene Gilman in connection with litigation
6/8/1998	WP/OP/JD	Attorney Notes	By Attorney Scoll	Notes include content of conference with client's counsel re: representation of T. Gene Gilman in connection with litigation
6/8/1998	AC/WP/OP/JD	Attorney Notes	By Attorney Scoll	Notes include content of conference with T. Gene Gilman re: representation of T. Gene Gilman in connection with litigation
6/5/1998	WP/OP/JD	Attorney Notes	By Attorney Scoll	Notes include content of conference with client's counsel re: representation of T. Gene Gilman in connection with litigation
6/4/1998	AC/WP/OP/JD	Attorney Notes	By Attorney Scoll	Notes include content of conference with client's counsel and T. Gene Gilman re: representation of T. Gene Gilman in connection with litigation
Undated	AC/WP/JD	Notes	From T. Gene Gilman to Attorney Scoll	Notes to Attorney Scoll by T. Gene Gilman re: representation of T. Gene Gilman in connection with litigation
6/1/1998	AC/WP/OP/JD	Faxed Notes	From T. Gene Gilman to Attorney Scoll	Notes to Attorney Scoll by T. Gene Gilman re: representation of T. Gene Gilman in connection with litigation
6/1/1998	AC/WP/OP/JD	Faxed letter with Note thereon	Note by T. Gene Gilman (faxed from T. Gene Gilman to Attorney Scoll)	Notes to Attorney Scoll by T. Gene Gilman re: representation of T. Gene Gilman in connection with litigation



DATE	PRIVILEGE	DOCUMENT TYPE	PARTIES	DESCRIPTION
6/3/1998	AC/WP/OP/JD	Attorney Notes	By Attorney Scoll	Notes include content of conference with T. Gene Gilman and content of conference with client's counsel re: representation of T. Gene Gilman in connection with litigation
6/2/1998	WP/OP/JD	Attorney Notes	By Attorney Scoll	Re: representation of T. Gene Gilman in connection with litigation
6/3/1998	WP/OP/JD	Attorney Notes	By Attorney Scoll	Re: representation of T. Gene Gilman in connection with litigation
6/1/1998	WP/JD	Faxed document with Attorney Notes thereon	Fax from T. Gene Gilman to Attorney Scoll; document contains Attorney Notes	Re: representation of T. Gene Gilman in connection with litigation
3/6/1997	AC/WP/JD	Client Notes	Notes by T. Gene Gilman	Notes given to Attorney Scoll by T. Gene Gilman re: representation of T. Gene Gilman in connection with litigation
6/1/1998	WP/OP/JD	Facsimile	From Attorney Scoll to client's counsel	Re: representation of T. Gene Gilman in connection with litigation
6/1/1998	WP/OP/JD	Attorney Notes	By Attorney Scoll	Notes include content of conference with client's counsel re: representation of T. Gene Gilman in connection with litigation
Undated	WP/OP/JD	Attorney Notes	By Attorney Scoll	Re: representation of T. Gene Gilman in connection with litigation
5/29/1998	AC/WP/JD	Facsimile	From Steven Gilman to Attorney Scoll	Re: representation of T. Gene Gilman in connection with litigation
5/29/1998	WP/OP/JD	Facsimile	From Attorney Scoll to client's counsel	Re: representation of T. Gene Gilman in connection with litigation
5/28/1998	AC/WP/OP/JD	Attorney Notes	By Attorney Scoll	Notes on conference with Steven Gilman re: representation of T. Gene Gilman in connection with litigation
5/28/1998	WP/OP/JD	Attorney Notes	By Attorney Scoll	Notes include content of conference with client's counsel re: representation of T. Gene Gilman in connection with litigation
5/27/1998	WP/OP/JD	Attorney Notes	By Attorney Scoll	Notes include content of conference with client's counsel re: representation of T. Gene Gilman in connection with litigation
5/27/1998	AC/WP/OP/JD	Attorney Notes	By Attorney Scoll	Notes include content of conference with T. Gene Gilman re: representation of T. Gene Gilman in connection with litigation
5/26/1998	AC/WP/OP/JD	Attorney Notes	By Attorney Scoll	Notes include content of conference with T. Gene Gilman re: representation of T. Gene Gilman in connection with litigation
5/8/1997	WP/OP/JD	Attorney Notes	By Attorney Scoll	Notes include content of conference with T. Gene Gilman re: representation of T. Gene Gilman in connection with litigation
10/22/1997	WP/OP/JD	Attorney Notes	By Attorney Scoll	Re: representation of T. Gene Gilman in connection with litigation
3/5/1997	AC/WP/OP/JD	Attorney Notes	By Attorney Scoll	Notes include content of conference with T. Gene Gilman re: representation of T. Gene Gilman in connection with litigation
3/3/1997	WP/OP/JD	Attorney Notes	By Attorney Scoll	Re: representation of T. Gene Gilman in connection with litigation

DATE	PRIVILEGE	DOCUMENT TYPE	PARTIES	DESCRIPTION
2/28/1997	AC/WP/OP/JD	Attorney Notes	By Attorney Scoll	Re: representation of T. Gene Gilman in connection with litigation
3/4/1997	AC	Letter	From outside counsel to T. Gene Gilman	Re: potential representation of T. Gene Gilman in connection with litigation
8/3/2000	AC/WP/OP/JD	Letter	To X from X's Attorney	(joint defense privilege) re: representation of T. Gene Gilman in connection with litigation
Undated	WP/OP/JD	Draft Court Filings with Attorney Notes thereon	Notes by Attorney Scoll	Re: representation of T. Gene Gilman
4/26/2000	AC/WP/JD	Letter	From X to X's Attorney	(joint defense privilege) re: representation of T. Gene Gilman in connection with litigation
3/29/2000	AC/WP/OP/JD	Letter	From X's Attorney to X	(joint defense privilege) re: representation of T. Gene Gilman in connection with litigation
2/11/2000	AC/JD	Facsimile	From T. Gene Gilman to Attorney Scoll	Re: representation of T. Gene Gilman in connection with litigation
10/6/1999	AC/WP/OP/JD	Memo	From Attorney Scoll to T. Gene Gilman	Re: representation of T. Gene Gilman in connection with litigation
10/4/1999	WP/OP/JD	Facsimile	From Attorney Scoll to client's counsel	Re: representation of T. Gene Gilman in connection with litigation
9/23/1999	AC/WP/OP/JD	Letter	From X's Attorney to X	(joint defense privilege) re: representation of T. Gene Gilman in connection with litigation
9/23/1999	WP/OP/JD	Letter	From X's Attorney to third party	(joint defense privilege) re: representation of T. Gene Gilman in connection with litigation
3/29/1999	AC/WP/OP/JD	Letter	From T. Gene Gilman to client's counsel and Attorney Scoll	Re: representation of T. Gene Gilman in connection with litigation (letter contains content of legal advice received from other counsel)
3/3/1999	WP/OP/JD	Court Filing with Attorney Notes thereon	Notes by Attorney Scoll	Re: representation of T. Gene Gilman in connection with litigation
Undated	WP/OP/JD	Research Materials with Attorney Notes thereon	Notes by Attorney Scoll	Re: representation of T. Gene Gilman in connection with litigation
3/4/1997	WP/OP/JD	Computer Generated Report with Attorney Notes thereon	Notes by Attorney Scoll	Re: representation of T. Gene Gilman in connection with litigation
8/6/1998	WP/OP/JD	Attorney Notes	By Attorney Scoll	Re: representation of T. Gene Gilman in connection with litigation
8/4/1998	AC/WP/OP/JD	Letter	From client's counsel to T. Gene Gilman with cc to Attorney Scoll	Re: representation of T. Gene Gilman in connection with litigation
Undated	WP/OP/JD	Docket Report with Attorney Notes thereon	Notes by Attorney Scoll	Re: representation of T. Gene Gilman in connection with litigation
8/19/1998	AC/WP/JD	Facsimile	From Steven Gilman to Attorney Scoll	Re: representation of T. Gene Gilman in connection with litigation
7/28/1998	AC/WP/OP/JD	Attorney Notes	By Attorney Scoll	Notes include content of communication with Steve Gilman re: representation of T. Gene Gilman in connection with litigation
9/17/1998	AC/WP/JD	Facsimile	From Steven Gilman to client's counsel	Re: representation of T. Gene Gilman in connection with litigation
Undated	WP/OP/JD	Computer Generated Report	Created by Steven Gilman	Re: representation of T. Gene Gilman in connection with litigation
8/25/1998	WP/OP/JD	Correspondence with Attorney Notes thereon	Notes by Attorney Scoll	Re: representation of T. Gene Gilman in connection with litigation
8/25/1998	WP/OP/JD	Correspondence with Attorney Notes thereon	Notes by Attorney Scoll	Re: representation of T. Gene Gilman in connection with litigation



DATE	PRIVILEGE	DOCUMENT TYPE	PARTIES	DESCRIPTION
8/25/1998	WP/OP/JD	Correspondence with Attorney Notes thereon	Notes by Attorney Scoll	Re: representation of T. Gene Gilman in connection with litigation
8/25/1998	WP/OP/JD	Correspondence with Attorney Notes thereon	Notes by Attorney Scoll	Re: representation of T. Gene Gilman in connection with litigation
8/25/1998	WP/OP/JD	Correspondence with Attorney Notes thereon	Notes by Attorney Scoll	Re: representation of T. Gene Gilman in connection with litigation
9/10/1998	AC/WP/JD	Facsimile	From Steve Gilman to client's counsel	Re: representation of T. Gene Gilman in connection with litigation
Undated	WP/OP/JD	Computer Generated Report with Attorney Notes thereon	Notes by Attorney Scoll	Re: representation of T. Gene Gilman in connection with litigation
8/27/1998	WP/OP/JD	Correspondence with Attorney Notes thereon	Notes by Attorney Scoll	Re: representation of T. Gene Gilman in connection with litigation
8/27/1998	WP/OP/JD	Correspondence with Attorney Notes thereon	Notes by Attorney Scoll	Re: representation of T. Gene Gilman in connection with litigation
Undated	AC/WP/OP/JD	Note by client on Correspondence and Attorney Notes on Correspondence	By Steve Gilman to Attorney Scoll	Re: representation of T. Gene Gilman in connection with litigation
Printed on 6/17/2004	AC/JD	Computer Generated Report	Report created by Attorney Scoll	Client Billing Worksheet for work performed for T. Gene Gilman (includes content of conference with T. Gene Gilman and client's other counsel)
Printed on 6/17/2004	AC/JD	Computer Generated Report	Report created by Attorney Scoll	Client Billing Worksheet for work performed for T. Gene Gilman (includes content of communication from Attorney Scoll to T. Gene Gilman)
11/24/1998	AC/WP/JD	Facsimile	From Steve Gilman to client's counsel	Re: representation of T. Gene Gilman in connection with litigation
11/23/1998	AC/WP/JD	Facsimile	From Steve Gilman to client's counsel	Re: representation of T. Gene Gilman in connection with litigation
11/20/1998	AC/WP/JD	Facsimile	From Steve Gilman to client's counsel	Re: representation of T. Gene Gilman in connection with litigation
12/2/1998	AC/WP/JD	Facsimile	From Steve Gilman to client's counsel	Re: representation of T. Gene Gilman in connection with litigation
11/19/1998	WP/OP/JD	Attorney Notes	By Attorney Scoll	Re: representation of T. Gene Gilman in connection with litigation
11/18/1998	AC/WP/JD	Facsimile	From Steve Gilman to client's counsel	Re: representation of T. Gene Gilman in connection with litigation
8/25/1998	WP/OP/JD	Correspondence with Attorney Notes thereon	Notes by Attorney Scoll	Re: representation of T. Gene Gilman in connection with litigation
8/25/1998	WP/OP/JD	Correspondence with Attorney Notes thereon	Notes by Attorney Scoll	Re: representation of T. Gene Gilman in connection with litigation
10/27/1998	AC/WP/OP/JD	Faxed Letter	From client's counsel to T. Gene Gilman	Re: representation of T. Gene Gilman in connection with litigation
10/26/1998	AC/WP/JD	Facsimile	From Steve Gilman to client's counsel	Re: representation of T. Gene Gilman in connection with litigation
10/15/1998	WP/OP/JD	Correspondence with Attorney Notes thereon	Notes by Attorney Scoll	Re: representation of T. Gene Gilman in connection with litigation
10/15/1998	WP/OP/JD	Correspondence with Attorney Notes thereon	Notes by Attorney Scoll	Re: representation of T. Gene Gilman in connection with litigation
10/15/1998	WP/OP/JD	Correspondence with Attorney Notes thereon	Notes by Attorney Scoll	Re: representation of T. Gene Gilman in connection with litigation